

SJ Exhibit 8

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES GARAVAGLIA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20-cv-01681-CDP
)	
CITY OF ST. LOUIS, et al.,)	
)	
Defendants.)	

DECLARATION OF JAMES GARAVAGLIA

I, James Garavaglia, declare as follows:

1. I am over the age of eighteen.
2. I was the Deputy Comptroller for the City of St. Louis from 2017 to October 1, 2019, and was working directly under the supervision of the Comptroller Darlene Green ("Green") during that time.
3. I am a resident of the State of Missouri and maintain my only residence there.
4. On July 2, 2019, I was placed on unpaid forced administrative leave by Green and was provided no explanation or basis for the action.
5. In order to continue to receive pay, I was forced to use my accumulated vacation leave while on forced leave in order to receive any income.
6. I timely appealed my forced leave to the Civil Service Commission for the City of St. Louis, and thereafter Green rescinded and withdrew my forced leave, effective that same date.

7. After the forced leave was rescinded, my vacation time that I had used from July 2, 2019, to July 22, 2019 was restored.

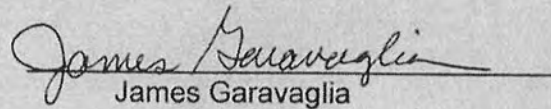
8. However, on July 23, 2019, the same day my original forced leave was rescinded, I was again placed back on forced leave without pay and was again forced to use my accumulated vacation leave in order to receive any income.

9. I again timely appealed my forced leave to the Civil Service Commission for the City of St. Louis, and on August 28, 2019, Green rescinded and withdrew my forced leave, which became effective that same date.

10. After the forced leave was rescinded, my vacation time that I had used from July 23, 2019, to August 29, 2019, was again restored on September 20, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 30th day of June, 2021, in the State of Missouri, United States of America.


James Garavaglia